REMARKS/ARGUMENTS

Claims 1-5, 7-15 and 17-28 are pending in the application, and claim 29 has been cancelled without prejudice or disclaimer. Claims 1-5, 7-15 and 17-29 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Publication No. 2006/0239453 to Halpern. This rejection is respectfully traversed.

Halpern fails to anticipate the claimed inventions, because it fails to disclose each element of the claimed inventions. Consider claim 1, which includes a system of digital data encryption in a digital device, comprising an integrated encryption key generator, a data buffer, an input/output register that interfaces with memory of the digital device and a memory controller that directs digital data from the memory to the data buffer with the digital data passing through the encryption key generator prior to entering the input/output register. The Examiner asserts that the integrated encryption key generator is disclosed at paragraphs [0022, 0045] of Halpern, but [0022] refers to the brief description of Fig. 6, which is a national key generator center, whereas [0045] refers to the functioning of the service center, which is used to allow two remotely located computers of different parties to communicate with each other. In contrast, the Examiner asserts that the claimed memory controller is some unidentified component of Fig. 8 and the claimed data buffer is apparently buffer 17 of Fig. 8, which is a diagram of a circuit that is located at each of two remotely located computers. As such, in order for any components of Halpern to be the claimed memory controller that directs digital data from the memory to the data buffer with the digital data passing through the encryption key generator prior to entering the input/output register, the claimed encryption key generator would need to be contained within the circuit of Fig. 8, and not at a remote center for generation of random security check numbers. There is a reason why Halpern has a remote center for generation of random security check numbers that is used by different remotely located computers, and it would be impossible to provide the functionality described in Halpern if that center for generation of random security check numbers was instead located at each computer. The rejection of claim 1 must therefore be withdrawn.

In regards to claim 2, the Examiner asserts that Halpern discloses that the encryption key generator includes an inaccurate clock, citing to paragraph [0015], but nothing in that paragraph of Halpern even suggests that any clock (which is not even disclosed in Fig. 5 of Halpern, which

is being described in [0015]) is inaccurate. The rejection of claim 2 must therefore be withdrawn.

Claim 9, as amended, includes an encryption key generator receiving a signal from an inaccurate clock and generating a plurality of keys for encrypting the encrypted digital data. As previously discussed, Halpern does not disclose an inaccurate clock, much less an encryption key generator receiving a signal from an inaccurate clock and generating a plurality of keys for encrypting the encrypted digital data. The rejection of claim 9 must therefore be withdrawn.

Claim 12 includes a method of digital data encryption in a digital device, comprising generating at least one key based on input received from an inaccurate clock. As previously discussed, Halpern does not disclose an inaccurate clock, much less generating at least one key based on input received from an inaccurate clock. The rejection of claim 12 must therefore be withdrawn.

Claim 22 includes a method to decrypt encrypted digital data stored in memory of a digital device, comprising generating at least one key based on input received from an inaccurate clock. As previously discussed, Halpern does not disclose an inaccurate clock, much less generating at least one key based on input received from an inaccurate clock. The rejection of claim 12 must therefore be withdrawn.

Claim 25 includes a set-top box apparatus in receipt of digital data for storage in a rewritable memory, comprising an encryption circuit with at least one key, a data buffer filled with the digital data and a memory controller that directs the storage of the digital data in the rewritable memory with the digital data being encrypted by the encryption circuit and the at least one key after the digital data has entered the data buffer but prior to being stored in the rewritable memory. The Examiner again relies on the teachings of Halpern related to a remote center for generation of random security check numbers that is used by different remotely located computers in combination with other teachings directed to a circuit that is used at each of the remotely located computers, and as previously discussed, it would be impossible to provide the functionality described in Halpern if that center for generation of random security check numbers was instead located at each computer, and in particular, if the encryption circuit at the remote center for generation of random security check numbers has to be inserted between the data buffer and the rewritable memory. The rejection of claim 25 must therefore be withdrawn.

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All claims not specifically addressed are allowable at least for the reasons that they depend from an allowable base claim and add limitations not found in the prior art.

CONCLUSION

In view of the foregoing remarks and for various other reasons readily apparent, Applicant submits that all of the claims now present are allowable, and withdrawal of the rejection and a Notice of Allowance are courteously solicited.

If any impediment to the allowance of the claims remains after consideration of this amendment, a telephone interview with the Examiner is hereby requested by the undersigned at (214) 953-5990 so that such issues may be resolved as expeditiously as possible.

No fee is believed due with this response. The Commissioner is hereby authorized to charge any fee or credit any refund to Deposit Account No. 10-0096.

Dated: July 24, 2009

Respectfully submitted,
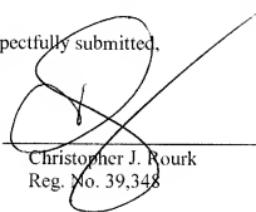
By: _____
Christopher J. Rourk
Reg. No. 39,348

Jackson Walker L.L.P.
901 Main Street
Suite 6000
Dallas, Texas 75202
Direct: 214-953-5990
Fax: 214-661-6604
Email: crourk@jw.com